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RECEIVED  
MAY 19 2025  
CLERK, U.S. DISTRICT COURT  
MINNEAPOLIS, MINNESOTA

9  
10 UNITED STATES DISTRICT COURT  
11  
12 FOR THE DISTRICT OF MINNESOTA

13  
14 Steve Salvador Ybarra  
15 Self-Represented  
16 Pro Se Litigant,

No. . 0:25-cv-01948-KMM-DJF

17 Plaintiff,  
18 v.  
19 Legal Assistance of Dakota County;  
20 Sharon Jones Esq., in her Individual  
21 and  
22 Official capacities;  
23 Hon. David Lutz, in his individual  
24 and  
25 Official capacities;  
26 Hon. Tanya Obrien, in her individual  
and official capacities;  
Hon. Dannie L Edwards, in her  
individual and official capacities;  
Lydia Clemens, in her individual and  
official capacities;  
Michelle Cathleen Ybarra,  
Attorney General Keith Ellison, in his  
individual and  
Official capacities;  
Assistant Attorney General Jeff  
Timmerman, in his individual and  
Official capacities;

27 Defendants.

PLAINTIFF'S STATEMENT OF  
DAMAGES IN SUPPORT OF  
MONETARY RELIEF, SETTLEMENT  
CONSIDERATION, AND NOTICE OF  
READINESS FOR TRIAL

1

2       **PLAINTIFF'S STATEMENT OF DAMAGES IN SUPPORT OF**

3       **MONETARY RELIEF, SETTLEMENT CONSIDERATION, AND**

4       **RECOGNITION OF LITIGATION-INDUCED COLLAPSE**

5

6       Plaintiff Steve Salvador Ybarra submits the following blended statement of  
7       damages and request for monetary relief under 42 U.S.C. §§ 1983, 1985(2), and 18  
8       U.S.C. § 1964(c) (RICO), along with a declaration of litigation-induced collapse  
9       supported by constitutional authority and request for structured resolution or trial  
scheduling.

10

11      **1. Compensatory Damages**

12      Plaintiff has now been denied access to his minor children for over eight (8)  
13      months due to a procedurally sealed fraud pattern involving false affidavits, judicial  
14      concealment, contempt-based retaliation, and ongoing obstruction. These events  
15      have caused compounding harm.

- 16
  - **Loss of parental time and consortium (8 months): \$400,000**
  - **Emotional distress and mental anguish: \$250,000**
  - **Litigation costs, filings, research, opportunity cost, and life disruption: \$2,355,000**
  - **Reputational injury and sealed contempt threats: \$75,000**

21      **Subtotal (Compensatory Damages): \$3,080,000**

22      Effective May 2025, Plaintiff reserves the right to increase compensatory  
23      damages by **\$50,000 per month** for each additional month of deprivation,  
24      retaliation, and delay.

25

26      **2. Punitive Damages**

27      Punitive damages are warranted under *Smith v. Wade*, 461 U.S. 30 (1983) due  
28      to repeated acts of willful concealment, post-notice entrenchment, and deliberate

1 suppression of Plaintiff's constitutional rights:

- 2 • **Sharon Jones** (sealed affidavit fraud): \$150,000
- 3 • **Michelle Ybarra** (documented perjury and concealment): \$100,000
- 4 • **Judge David Lutz** (retaliatory threats, suppression, Canon violations):  
5 \$150,000
- 6 • **Lydia Clemens** (neutrality breach, suppression of CPS recission): \$100,000
- 7 • **Jeff Timmerman** (Rule 11 violations, concealment of sealed Exhibit 312):  
8 \$150,000
- 9 • **Keith Ellison** (enterprise ratification and systemic oversight failure):  
10 \$150,000

11 **Subtotal (Punitive Damages): \$800,000**

12

13 **3. RICO Treble Damages (18 U.S.C. § 1964(c))**

14 Due to enterprise-level entrenchment by Legal Aid, judicial actors, and the  
15 Office of the Attorney General, Plaintiff seeks treble damages for financial and  
16 constitutional deprivation.

- 17 • **Base Losses (economic/litigation)**: \$300,000
- 18 • **Treble under 18 U.S.C. § 1964(c)**: \$900,000

19

20 **TOTAL DAMAGES DEMANDED: \$4,780,000**

21 Plaintiff submits this damages statement in conjunction with his prior  
22 Emergency Motion for Financial Relief, previously filed under Elrod v. Burns,  
23 Boddie v. Connecticut, and Tennessee v. Lane, documenting that:

- 24 • Plaintiff has been effectively locked out of his children's lives and judicial  
25 recourse
- 26 • He is four months behind on rent, facing eviction, with utilities disconnected
- 27 • He has invested over 3,000 hours in litigation, without relief, access, or  
28 response

1        This is not delay—this is **judicial entrenchment weaponized against a**  
2 **protective parent** through sealed process and government-backed obstruction.

3        Plaintiff remains open to a structured, global resolution that includes:

- 4        • Vacatur of all protective orders and sealed contempt findings
- 5        • Correction of the public and sealed record
- 6        • Restoration of unimpeded parenting time
- 7        • Financial compensation and acknowledgment of procedural harm
- 8        • Permanent non-retaliation protections

9        Absent such a resolution, Plaintiff is trial-ready and hereby requests this  
10 matter be set for jury trial.

11

12 Respectfully submitted,

13 **/s/ Steve Salvador Ybarra**

14 Steve Salvador Ybarra

15 Pro Se Litigant

16 California | Minnesota

17 Email: Steve@TheoryWerkx.com

18 Phone: (612) 544-4380

19 Footnotes (All citations to U.S.C. and Federal Rules unless otherwise noted)

20        1. *Carey v. Piphus*, 435 U.S. 247, 263–64 (1978) (*compensatory damages may be awarded for loss of parental liberty and constitutional due process violations*).

21        2. *Memphis Cnty. Sch. Dist. v. Stachura*, 477 U.S. 299, 307–09 (1986) (*emotional distress damages are recoverable for violations of constitutional rights under § 1983*).

22        3. *Fox v. Vice*, 563 U.S. 826, 834–35 (2011) (*litigants may recover reasonable costs and burdens tied directly to vindication of constitutional claims*).

23        4. *Owen v. City of Independence*, 445 U.S. 622, 633–34 (1980) (*reputational damage is actionable where caused by state actor misuse of power*).

24        5. *Smith v. Wade*, 461 U.S. 30, 51–56 (1983) (*punitive damages available under § 1983 for reckless or callous disregard of*

*federally protected rights).*

6. 18 U.S.C. § 1964(c); see *George v. Urban Settlement Servs.*, 833 F.3d 1242, 1251 (10th Cir. 2016) (RICO liability may extend to public-private entities engaging in enterprise fraud).

7. *Ehrod v. Burns*, 427 U.S. 347, 373 (1976) (“The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.”).

8. *Boddie v. Connecticut*, 401 U.S. 371, 377–78 (1971) (access to courts is a fundamental due process right where civil liberty interests are at stake).

9. *Tennessee v. Lane*, 541 U.S. 509, 523–24 (2004) (denial of meaningful access to courts implicates both due process and equal protection under the Constitution).

## CERTIFICATE OF SERVICE

I hereby certify that on **May 18, 2025**, I served a true and correct copy of the attached:

**PLAINTIFF'S MEMORANDUM OF LAW IN OPPOSITION TO  
DEFENDANTS' ANTICIPATED MOTION TO DISMISS UNDER RULE  
12(b)(6)**

upon the following parties by email and/or U.S. Mail:

- **Legal Assistance of Dakota County**  
Email: admin@dakotalegal.org
  - **Sharon Jones, Esq.**, in her individual and official capacities  
Legal Assistance of Dakota County  
Email: sjones@dakotalegal.org
  - **Jeff Timmerman** he/him/his  
Email: (confidential)  
Tel: (Confidential)
  - **Michelle Cathleen Ybarra**, Respondent

1 Email: shellbel1@hotmail.com  
2 This notice was served to all named parties via email where available and  
3 U.S. Mail where necessary, consistent with Fed. R. Civ. P. 5(b) and Local Rule 7.1.  
4 Respectfully submitted,  
5 /s/ **Steve Salvador Ybarra**  
6 Pro Se Litigant  
7 Steve@TheoryWerkx.com  
8 (612) 544-4380  
9 Executed May 17, 2025

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